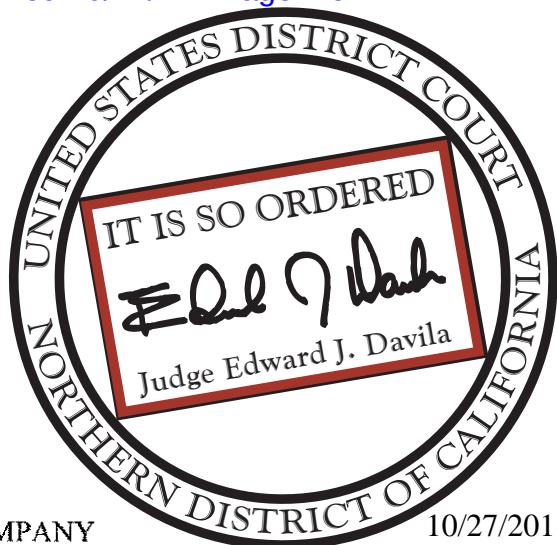


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Attorneys for Plaintiff
PROBUILDERS SPECIALTY INSURANCE COMPANY



10/27/2011

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROBUILDERS SPECIALTY INSURANCE)
COMPANY, RRG, a District of Columbia, Risk)
Retention Group,)
CASE NO.: CV10-05533-EJD
STIPULATION RE JUDGMENT

14 Plaintiff,)
15 v.)
16 VALLEY CORP. B., a California Corporation)
17 formerly known as R.J. HAAS CORP.; R.J.)
18 Haas, an individual; TY LEVINE, an)
individual; and KAREN LEVINE, an)
individual,)
19 Defendants.)
_____)

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG, ("ProBuilders") and Defendant TATSUKO ADACHI ("Mrs. Adachi"), that Mrs. Adachi will be bound by the Judgment that ProBuilders obtains, in the instant action, with respect to ProBuilders' claim for Declaratory Relief as to rescinding ProBuilders policy no. COM 5010992 ("the ProBuilders Policy").

WHEREAS Plaintiff filed its Second Amended Complaint on July 12, 2011;

WHEREAS Plaintiff's Second Amended Complaint named Mrs. Adachi as a Defendant,
based upon her status as an additional insured under the ProBuilders Policy;

WHEREAS, in the instant action, ProBuilders seeks to rescind the ProBuilders Policy based

1 upon alleged misrepresentations made by Valley Corp. B, a California Corporation formerly known
2 as R.J. Haas Corp.;

3 WHEREAS, in the instant action, the only claim for relief alleged against Mrs. Adachi is
4 ProBuilders' Third Claim for Relief for Declaratory Relief regarding ProBuilders' claim for
5 rescission;

6 WHEREAS, ProBuilders has provided Mrs. Adachi with a copy of the Second Amended
7 Complaint, in the instant action;

8 WHEREAS, Mrs. Adachi has reviewed the Second Amended Complaint, in the instant
9 action;

10 WHEREAS, Mrs. Adachi would like to avoid making an appearance in the instant action;

11 WHEREAS, ProBuilders has advised Mrs. Adachi that she should consult with an attorney
12 before executing the instant Stipulation;

13 WHEREAS, Mrs. Adachi has agreed to be bound by the Court's determination of
14 ProBuilder's Third Claim for Relief for Declaratory Relief regarding ProBuilders' claim for
15 rescission;

16 THEREFORE, ProBuilders and Mrs. Adachi Stipulate that (1) ProBuilders' will not serve
17 the Summons and Second Amended Complaint upon Mrs. Adachi, in the instant action; (2) Mrs.
18 Adachi will be bound by the Court's determination of ProBuilder's Third Claim for Relief for
19 Declaratory Relief regarding ProBuilders' claim for rescission, in the instant action; and (3)
20 ProBuilders and Mrs. Adachi shall bear their own costs and fees, in the instant action.

21 **IT IS SO STIPULATED.**

22 DATED: September 21, 2011

October

YARON & ASSOCIATES

23 By:

24 
GEORGE D. YARON
JAMES I. SILVERSTEIN
HIELAM CHAN
Attorneys for Plaintiff
PROBUILDERS SPECIALTY INSURANCE
COMPANY, RRG

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1 DATED: September 11, 2011

2 By:

Tatsuko Adachi

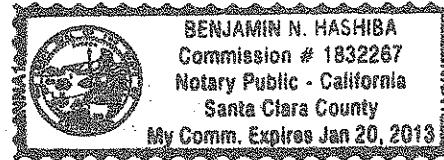
3 TATSUKO ADACHI

4 SUBSCRIBED and SWORN to before me

5 OCT 11
this 11 day of September, 2011

6 Benjamin N Hashiba

7 BENJAMIN N. HASHIBA
8 Notary Public



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CERTIFICATE OF SERVICE

I am over 18 years of age and not a party to the within action. I am employed in the County of San Francisco; my business address is **Yaron & Associates, 601 California Street, Suite 2100, San Francisco, California 94108.**

5 On October 26, 2011, I served the within:

STIPULATION RE JUDGMENT

on all parties in this action, as addressed below, by causing a true copy thereof to be distributed as follows:

TO ALL PARTIES ON THE ECF SERVICE LIST

VIA ELECTRONIC SERVICE: I served a true copy, with all exhibits, electronically on designated recipients through PACER. Upon completion of electronic transmission of said document(s), a receipt is issued to serving party acknowledging receipt by PACER's system. Once PACER has served all designated recipients, proof of electronic service is returned to the filing party which will be maintained with the original document(s) in our office. This service complies with CCP §101.6.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **October 26, 2011**, at San Francisco, California.


LYDIA BURTON